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Attorneys for ABN AMRO RETAINED NOMINEES (IOM) LIMITED, f/k/a ABN AMRO Fund Services (Isle of Man) Nominees, and f/k/a Fortis (Isle of Man) Nominees Limited

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

ABN AMRO RETAINED NOMINEES (IOM)
LIMITED, f/k/a ABN AMRO Fund Services (Isle
of Man) Nominees, and f/k/a Fortis (Isle of Man)
Nominees Limited, and PLATINUM ALL
WEATHER FUND LIMITED,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01697 (CGM)

**DECLARATION OF THOMAS GIBLIN IN SUPPORT OF ABN AMRO RETAINED
NOMINEES (IOM) LIMITED'S MOTION TO DISMISS THE AMENDED COMPLAINT**

I, Thomas J. Giblin, hereby declare:

1. I am a counsel at the law firm of Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York, 10020, attorneys for Defendant ABN AMRO Retained Nominees (IOM) Limited, f/k/a ABN AMRO Fund Services (Isle of Man) Nominees, and f/k/a Fortis (Isle of Man) Nominees Limited (“IOM Nominees”).

2. As a member in good standing in this Court and in the Bar of the State of New York, I respectfully submit this Declaration in support of IOM Nominees’ Motion to Dismiss the Amended Complaint.

3. Attached hereto as Exhibit 1 is a true and correct copy of a Subscription Agreement with Fairfield Sentry Limited, entered into by Fortis (Isle of Man) Nominees Limited on behalf of Platinum All Weather Fund Limited on January 29, 2007 (the “January 2007 Platinum Subscription Agreement”), referenced in paragraph 74 of the Amended Complaint.

4. Attached hereto as Exhibit 2 is the Fairfield Sentry Limited Subscription Agreement entered into by Fortis (Isle of Man) Nominees Limited on behalf of Platinum on January 31, 2008 (the “2008 Platinum Subscription Agreement”), referenced in paragraph 75 of the Amended Complaint.

5. Attached hereto as Exhibit 3 is a true and correct copy of a Subscription Agreement with Fairfield Sentry Limited, entered into by Fortis (Isle of Man) Nominees Limited on behalf of Seven Seas International Fund on August 3, 2007 (the “Seven Seas Subscription Agreement”).

6. Attached hereto as Exhibit 4 is a true and correct copy of a request for the redemption of shares in Fairfield Sigma Limited, made by IOM Nominees on behalf of ABZ assetX World Selection Ltd. on December 31, 2006.

I declare under penalty of perjury the foregoing is true and correct, pursuant to 28 U.S.C.
§ 1746.

Executed this 12th day of January, 2023 in New York, New York.

A handwritten signature in black ink, appearing to read 'Th J Giblin', with a long horizontal flourish extending to the right.

Thomas J. Giblin